

# **EXHIBIT 3**

**EXHIBIT TO  
JOINT PRETRIAL ORDER**

Case 4:21-cv-01997 Document 71-3 Filed on 10/06/23 in TXSD Page 2 of 7  
IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

VIRGINIA ELIZONDO

*Plaintiff,*

v.

SPRING BRANCH ISD, COURTNEY ANDERSON, JOHN PEREZ, CAROLINE BENNETT, SHANNON MAHAN, MINDA CAESAR, CHRIS EARNEST, LISA ALPE, in their official Capacities as members of the Board of Trustees of Spring Branch ISD

*Defendants.*

§ Civ. Action No. 4:21-CV-01997  
§  
§ **SIM LAKE**  
§ **JUDGE**  
§ **Sheila R. Anderson** \_\_\_\_\_  
§ **COURTROOM CLERK** **REPORTER**  
§  
§  
§ **Bench Trial**  
§ **PROCEEDING**

**PLAINTIFF'S OBJECTIONS TO DEFENDANTS' TRIAL EXHIBITS**

Plaintiff Virginia Elizondo's Objections to Defendants' Trial Exhibits are contained in the attached table. For ease of reference, objections have been made using the following numerical codes, corresponding to various categories of objections:

<b>Objection Code:</b>	<b>Category of Objection:</b>
0	No Objection
1	Irrelevant
2	Hearsay
3	FED. R. EVID. 403
4	Objection to General Offer
5	Authentication or Identification of Document Required
6	Optional Completeness
7	Unidentified Handwriting
8	FED. R. EVID. 408

Respectfully submitted,

/s Barry Abrams \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I certify that the foregoing document was served on all parties of record via the Court's electronic filing system on October 6, 2023

/s/ Barry Abrams  
Barry Abrams

**PLAINTIFF'S OBJECTIONS TO DEFENDANTS' TRIAL EXHIBITS**

				Date	
NO.	DESCRIPTION	OFFR	OBJ	ADMIT	N/ADM
1	Facility Projects by Bond Program and Campus (Tijerina Depo Exhibit 2)		0		
2	Stein Data (Stein Depo Exhibit 2)		0		
3	Demonstrative SBISD Single-Member District (Stein Depo Exhibit 4)		0		
4	Meier and Rutherford Article (Stein Depo Exhibit 5)		2, 3, 4		
5	Susan Welch Article (Stein Depo Exhibit 6)		2, 3, 4		
6	Republican Party Press Release (Stein Depo Exhibit 8)		2, 3, 4, 5		
7	Report of Dr. Alford		0		
8	Supplemental and Rebuttal Report of Dr. Alford		0		
9	SBISD Policy BBB (LEGAL) (SBISD 6919-6923)		0		
10	SBISD Policy BBB (LOCAL) (SBISD 6924)		0		
11	Election Results: May 2022 (SBISD 7556-7577)		0		
12	Election Results: May 2023 (SBISD 7937-7938)		0		
13	Election Results, 2011 (SBISD 346-349)		0		
14	E-mail Dated March 29, 2021 (P 103)		2,3,4		
15	E-Mail Dated April 1, 2022 (P 131)		2,3,4,5		
16	E-mail Dated February 24, 2021 (P 198-200)		0		
17	What can a School Board Actually Do? (Elizondo Depo Exhibit 8)		0		
18	Myth / Fact (Elizondo Depo Exhibit 9)		0		
19	Emails Trustees/Parker (SBISD 4376-4379)		2,3,4,5		
20	Spring Branch Independent School District Total voters (Exhibit E1 SBISD 000363)		0		

21	Canvass Results report Spring Branch ISD Trustee election (Exhibit E11 SBISD 000396)		0		
22	SBISD Election Results, 2012 (SBISD 350-351)		0		
23	VRW celebrates its 60 <sup>th</sup> Anniversary invite to Virginia Elizondo (Exhibit E5)		0		
24	SBISD Election Results 2013 (SBISD 359)		0		
25	SBISD Student Code of Conduct 2021-2022		0		
26	Virginia Elizondo For SBISD Facebook post masks optional board vote summary (SBISD 007961)		0		
27	8/30/21 Email from Priscilla Blossom		2,3,4,5		
28	Letter to the Editor The Houston Chronicle (Exhibit E4)		1,2,4,5		
29	Video (P 55)		0		
30	Video P (27)		0		
31	John Perez PAC's and Organization's (SBISD 007962)		0		
32	Matt Rinaldi Endorsements (SBISD 007997)		0		
33	1776 Project PAC Endorsed Winners Facebook post (SBISD 007940)		0		
34	Hispanic Republicans of Texas Current Officeholders (SBISD 007973)		1,2,4,5		
35	Courtney Anderson Constitutional Conservative's Event Facebook post (SBISD 7953)		0		
36	Courtney Anderson Conservative leaders forum Facebook post (SBISD 007952)		0		
37	Courtney Anderson Endorsed by Ted Cruz Facebook post (SBISD 007956)		0		
38	Courtney Anderson Endorsed by Republican Party of Texas and Harris County GOP (SBISD 7969)		0		
39	Harris County GOP Courtney Anderson Endorsement Facebook post (SBISD 7970)		0		
40	Courtney Anderson Endorsed by Republican Party of Texas and Harris County GOP (SBISD 7972)		0		
41	Courtney Anderson Texts (Earnest 907-917)		2,3,4		

42	Courtney Anderson Village Republican Women Facebook post (SBISD 008007)		0		
43	Harris County Republican Party Endorses Courtney Anderson and Shannon Mahan Facebook post (SBISD 008002)		0		
44	Parents For Improved Public Education SBISD board Candidates (SBISD 007989)		0		
45	Courtney Anderson Lincoln Reagan Dinner Facebook post (SBISD 007931)		0		
46	Chris Earnest Union involvement Facebook post (SBISD 007949)		2,3,4 unless redacted		
47	Chris Earnest Facebook post about misinformation about school board power (SBISD 007947)		0		
48	Pipelinesbisd Facebook post Trustee Chris Earnest sets the record straight on Michael Berry Show (SBISD 007946)		2,3,4,5		
49	Chris Earnest Facebook post about progress related to unmasking of our children from Dr. Blaine (SBISD 7945)		0		
50	Chris Earnest Facebook post pictures of union attempts to infiltrate our schools (SBISD 7950)		0		
51	David Lopez For Spring Branch ISD poster (SBISD 007967)		0		
52	Harris County Precinct 0407 Democrat Facebook post Please go Vote (SBISD 007968)		2,4,5		
53	CROWDPAC David Lopez endorsement page (SBISD 8013)		0		
54	Texas Blue Action Democrats Facebook post Endorsement of David Lopez and Becky Ardell Downs (SBISD 8006)		0		
55	David Lopez Facebook post Last Chance to Vote (SBISD 8003)		0		
56	David Lopez Profile and Ted Cruz “Far Right Extremist Senator Endorses Courtney Anderson and Shannon Mahan” (SBISD 8005)		0		
57	David Lopez Facebook post Call to Action protest school openings till its safe (SBISD 7957-7958)		0		
58	Map (SBISD 1)		0		
59	Lopez E-mail Chain April, 2019 (Lopez 20-22)		0		
60	Lopez E-mail Chain re: VAN (Lopez 64-65)		0		

61	Lopez E-mail chain with D'armi (Lopez 68)		0		
62	Lopez Link to Facebook Page (Lopez 2655)		0		
63	Noel Lezama Facebook post “when school boards go extreme teachers flee.” (SBISD 8008)		0		
64	Noel Lezama Text chain screen shot with Ronald (Lezama 39)		0		
65	Noel Lezama Text chain screenshots group text (Lezama 50)		0		
66	Noel Lezama Text chain screenshot with Craig Adams (Lezama 78)		0		
67	Noel Lezama Text from GOP (Lezama 41)		0		
68	David Lopez Facebook Post dated June 13 and Houston Landing Article Available at <a href="https://www.facebook.com/DLOTX/">https://www.facebook.com/DLOTX/</a> and <a href="https://houstonlanding.org/critics-want-more-diversity-on-spring-branch-isd-school-board/?fbclid=IwAR2o08SJiEZQTu3ozwhDngXoanzCMEU860Gg6knHhpHz4uWy-6PbHj62EIE">https://houstonlanding.org/critics-want-more-diversity-on-spring-branch-isd-school-board/?fbclid=IwAR2o08SJiEZQTu3ozwhDngXoanzCMEU860Gg6knHhpHz4uWy-6PbHj62EIE</a>		0		
69	Houston Public Media Article <a href="https://www.houstonpublicmedia.org/articles/news/politics/2023/05/05/450913/texas-school-board-races-pac-funding-increases-critics-donations-unprecedented/">https://www.houstonpublicmedia.org/articles/news/politics/2023/05/05/450913/texas-school-board-races-pac-funding-increases-critics-donations-unprecedented/</a>		0		